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west virginia department of environmental protection

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Jim Justice, Governor  
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**MEMORANDUM**

**To:** Bev McKeone  
**From:** Jerry Williams   
**Date:** March 16, 2017  
**Subject:** PD17-019, ARP Mountaineer Production, LLC (081-00202) CO-4 Compressor Site

ARP Mountaineer Production, LLC submitted PD17-019 on March 13, 2017. PD17-019 was submitted to request a determination for a like kind engine replacement. ARP intends to replace the existing engine, 400 hp Waukesha F-18GL 4-stroke, lean burn engine (manufactured February 2004) with a 400 hp Waukesha F-18GL 4-stroke, lean burn engine (manufactured April 2003).

The following table indicates the emissions associated with these units.

<b>Pollutant</b>	<b>400 hp Waukesha F-18GL 4SLB February 2004 (tons/year)</b>	<b>400 hp Waukesha F-18GL 4SLB April 2003 (tons/year)</b>	<b>Net Facility Wide Emissions Changes (tons/year)</b>
Nitrogen Oxides	7.70	7.72	0.02
Carbon Monoxide	6.75	5.02	-1.73
Volatile Organic Compounds	2.89	1.04	-1.85
Particulate Matter-10/2.5	0.01	0.01	0
Sulfur Dioxide	0.01	0.01	0
Formaldehyde	0.70	0.66	-0.04

45CSR13 Section 2.17.f.2 states that routine maintenance, repair, and replacement (excluding such activities that are subject to new source performance standards under 45CSR16) shall not constitute a modification of a stationary source. Based on the manufacture date of these engines, neither of these engines are subject to new source performance standards under 45CSR16.

45CSR13 Section 2.24 defines a "Stationary source" as any building, structure, facility, installation, or emission unit or combination thereof, excluding any emissions unit which meets or falls below the criteria delineated in Table 45-13B, which:

- Is subject to any substantive requirement of an emission control rule promulgated by the Secretary.
- Discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant.
- Discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis.
- Discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater.
- An owner or operator voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so.

In conclusion, a permit is not required for the proposed facility based upon the submitted permit determination which indicates that the proposed facility is below the emission thresholds and does not trigger a substantive requirement of any State or Federal air quality regulation.